

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:

Chapter 11

DELPHI CORPORATION, ET AL,

Case No. 05-44481 (RDD)

Debtor,  
\_\_\_\_\_

**RESPONSE OF CREDITOR MICHIGAN HERITAGE BANK  
TO NINTH OMNIBUS OBJECTION**

**NOW COMES**, Creditor Michigan Heritage Bank, a Michigan banking corporation, by and through its attorneys, Sotiroff & Abramczyk, P.C., and for its response to Debtor's Ninth Omnibus Objection, states as follows:

1. Creditor Michigan Heritage Bank ("MHB") is the Lessor under Equipment Schedule No. 007 dated October 7, 2003 to Master Lease Agreement dated as of March 30, 2001, wherein Delphi Corporation is the Lessee (the "Lease").
2. Debtor is currently utilizing the subject Equipment under the Lease and the Lease has not been assumed.
3. MHB filed a Proof of Claim on or about May 30, 2006 (copy attached) in the amount of \$766,355.00 representing the balance due under the Lease as of such date.
4. MHB objects to the proposed modification of its claim as the amount due MHB is in excess of the proposed modification.

**WHEREFORE**, Michigan Heritage Bank requests that its filed Proof of Claim be allowed in full without modification.

Dated: March 6, 2007

SOTIROFF & ABRAMCZYK, P.C.

By: \_\_\_\_\_

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